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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
BARRY LAMAR BONDS,)
)
Defendant.)

Criminal No. CR 07-0732 SI

UNITED STATES' WITNESS LIST

Trial: March 2, 2009
Time: 8:30 a.m.
Court: Hon. Susan Illston

The United States hereby provides notice to the Court and to the defendant of the witnesses it may call in its case-in-chief at the trial. This list is intended to be inclusive. The government may not call all of the witnesses on this list. The government reserves the right to supplement this list as trial preparations progress. The government will notify the defendant of any changes to its witness list.

1 1. Bell, Kimberly: Ms. Bell, the defendant's former girlfriend, will testify that
2 the defendant told her that he was taking steroids prior to the 2000 Major League Baseball
3 season. Ms. Bell will further testify to personal observations regarding changes in the
4 defendant's body during the period of time beginning in the year 2000, including bloating, acne
5 on the shoulders and back, hair loss, and testicle shrinkage. Ms. Bell will further testify to
6 occasions in which she saw the defendant and Greg Anderson together.

7 2. Benard, Marvin: Mr. Benard, a former professional baseball player, will testify that
8 he met Greg Anderson during Benard's tenure with the San Francisco Giants. He will also
9 testify that he began working with Anderson in approximately 1999 and that Anderson assisted
10 him in having his blood tested. Mr. Benard will testify about receiving performance enhancing
11 substances from Anderson, about instructions from Anderson about how to administer the
12 substances, about the schedule Anderson gave to him for administering the substances, and about
13 what Mr. Anderson told him about the efficacy of those substances.

14 3. Bergland, Wendy: She will testify that she is a Special Agent with IRS-CID and that
15 she transported the box of folders located by Mike Wilson to Special Agent Jeff Novitzky.

16 4. Larry D. Bowers, Ph.D., DABC: Dr. Bowers will testify that he is employed as
17 the Senior Managing Director, Technical and Information Resources, for the United
18 States Anti Doping Agency (USADA). Based on his training and experience, Dr. Bowers
19 will also testify that certain items identified in the urine tests of the defendant were
20 anabolic steroids and that it is illegal to distribute and obtain those without a legitimate
21 medical condition requiring a prescription from a physician. Dr. Bowers will also testify
22 to the side effects of steroid use, including effects on blood values, possible organ
23 damage, and other side effects. Dr. Bowers will further testify to his opinion that test
24 results for some blood samples provided by the defendant indicate organ damage and
25 possible steroid use by the defendant

26 5. Catlin, Dr. Don: Dr. Catlin will testify that the UCLA Olympic Lab performed the
27 testing on the urine sample collected from the defendant by Major League Baseball (MLB). He
28 will testify to the results of those tests and their meaning, including the use and results of the

1 Carbon Isotope Ratio test. Dr. Catlin will testify that the results of the test were that he found
2 exogenous testosterone, THG, and clomid in the 2003 sample. He will also testify that THG was
3 never commercially available from any source (other than Patrick Arnold) during the time of the
4 defendant's THG-positive urine samples. As such, Dr. Catlin's testimony also includes
5 statements as a percipient witness.

6 6. Conte, Stan: Mr. Conte will testify that he is a licensed physical therapist and
7 certified athletic trainer. He began working for the San Francisco Giants in 1992 and became
8 their head athletic trainer in 2000. He will testify regarding his professional background and
9 qualifications and his job duties with the Giants. Mr. Conte will also testify about certain
10 interactions he had with the defendant, about statements by the defendant about Greg Anderson
11 and the search warrant conducted on Anderson's residence in September of 2003, and about
12 observations related to the defendant's physical appearance while working for the Giants. Mr.
13 Conte will testify about his knowledge of the defendant's relationships with third parties, such as
14 Steve Hoskins and Greg Anderson.

15 7. Estalella, Bobby: Mr. Estalella will testify that he was a professional baseball
16 player and that he met the defendant as a result of being employed by the San Francisco Giants.
17 Mr. Estalella will further testify that the defendant admitted using performance-enhancing drugs,
18 and that they had several discussions regarding that topic.

19 8. Geter, Ana: Ms. Geter, a now-retired former Special Agent with Internal Revenue
20 Service, Criminal Investigation will testify regarding her transport of the defendant's urine
21 sample from its seizure at Quest Laboratories pursuant to search warrant to the UCLA Analytical
22 Lab.

23 9. Giambi, Jason: Mr. Giambi will testify that he is a professional baseball player and
24 that he met Greg Anderson through the defendant. He will also testify that he began working
25 with Anderson in approximately November 2002 and that Anderson assisted him in having his
26 blood and urine tested through Balco. Mr. Giambi will testify about receiving performance
27 enhancing substances from Anderson, about instructions from Anderson about how to administer
28 the substances, about the schedule Anderson gave to him for administering the substances, and

1 about what Mr. Anderson told him about the efficacy of those substances.

2 10. Giambi, Jeremy: Mr. Giambi will testify that he was a professional baseball player
3 and that his brother, Jason Giambi, introduced him to Greg Anderson shortly after Jason began
4 working with Anderson in approximately November 2002. He will also testify that he provided
5 blood and urine samples to Anderson to be tested through Balco. Mr. Giambi will also testify
6 about receiving performance enhancing substances from Anderson, about instructions from
7 Anderson about how to administer the substances, about the schedule Anderson gave to him for
8 administering the substances, and about what Mr. Anderson told him about the efficacy of those
9 substances.

10 11. Hoskins, Kathy: Ms. Hoskins will testify that she was hired by the
11 defendant as a personal shopper and assistant. She will further testify that she observed
12 interactions between the defendant and Greg Anderson, including Anderson giving the defendant
13 an injection.

14 12. Hoskins, Steve: Mr. Hoskins will testify that he was childhood friends with the
15 defendant and that in approximately late 1992 or early 1993, he began working for the defendant
16 as his assistant. Mr. Hoskins will testify regarding the nature and extent of his working
17 relationship with the defendant, which included handling many of the defendant's personal
18 errands and scheduling, as well as managing the defendant's promotional activities related to his
19 baseball career. During their relationship, Mr. Hoskins became aware that the defendant was
20 using steroids with the assistance of his personal trainer, Greg Anderson. In this regard, he will
21 testify how he learned of the defendant's steroid use through, among other things, the defendant's
22 own admissions to Hoskins. Mr. Hoskins will also testify about other aspects of his relationship
23 with the defendant.

24 13. Izzo, Larry: Mr. Izzo will testify that he was a professional football player and that
25 he first contacted Greg Anderson by phone in approximately January 2003. Mr. Izzo will also
26 testify that he first met Anderson in person in approximately May 2003 at Balco and submitted a
27 urine sample at Balco at Anderson's request. Mr. Izzo will also testify that submitted additional
28 urine samples to Anderson at later times as well. Mr. Izzo will also testify about receiving

1 performance enhancing substances from Anderson, about instructions from Anderson about how
2 to administer the substances, about the schedule Anderson gave to him for administering the
3 substances, and about what Mr. Anderson told him about the efficacy of those substances.

4 14. Joseph, Dr. Jean: Dr. Joseph will testify regarding CDT's records related to the
5 urine sample the defendant produced to CDT in 2003 pursuant to MLB's testing protocol. Df

6 15. Kennedy, Dale: Mr. Kennedy will testify to the process of collecting urine
7 samples from the defendant in 2003 for testing pursuant to Major League Baseball's drug testing
8 program.

9 16. Novitzky, Jeff: Agent Novitzky, currently a Special Agent with the Food and
10 Drug Administration's Office of Criminal Investigations (FDA-OCI), and formerly a Special
11 Agent with the Internal Revenue Service – Criminal Investigation Division (IRS-CID), will
12 testify regarding the IRS-CID investigation for which the defendant was subpoenaed to the grand
13 jury in 2003, i.e. the criminal investigation into the conduct of Balco Laboratories, Victor Conte,
14 and Greg Anderson, among others. Agent Novitzky will testify to observations he made during
15 the execution of search warrants at Balco and Anderson's residence in September 2003 and the
16 role that those observations played in the investigative decision to subpoena the defendant to the
17 grand jury. He will also testify about the manner in which the defendant's false statements in the
18 grand jury influenced the criminal investigation of Conte and Anderson.

19 17. Qaqish, Amjad: Special Agent Qaqish, an agent with Internal Revenue Service-
20 Criminal Investigation, will testify regarding his identification, seizure, and disposition of
21 documents taken from Anderson's residence during the September 3, 2003 search, including
22 calendars and handwritten notes.

23 18. Rios, Armando: Mr. Rios will testify that he was a professional baseball player and
24 that he met Greg Anderson during Rios's tenure with the San Francisco Giants. He will also
25 testify that he began working with Anderson in 2001 and that Anderson assisted him in having
26 his urine tested after Rios left the Giants for another team in 2002. Mr. Rios will testify about
27 receiving performance enhancing substances from Anderson, about instructions from Anderson
28 about how to administer the substances, about the schedule Anderson gave to him for

1 administering the substances, and about what Mr. Anderson told him about the efficacy of those
2 substances.

3 19. Sample, Dr. Barry: Dr. Sample will testify regarding the records of Quest
4 Diagnostics as well as to the methodology utilized to test urine samples and to certain lab test
5 results.

6 20. Santiago, Benito: Mr. Santiago will testify that he was formerly a professional
7 baseball player for several teams, including the San Francisco Giants in 2001, 2002, and 2003.
8 While playing for the Giants, Mr. Santiago met Greg Anderson and ultimately received
9 performance enhancing substances from Anderson. Mr. Santiago will also testify about the
10 process of providing urine samples to Greg Anderson for testing for the presence of steroids. Mr.
11 Santiago will also testify about schedules or calendars Greg Anderson made for him in
12 connection with the performance enhancing substances regimen Anderson designed for Mr.
13 Santiago.

14 21. Ting, Dr. Arthur: Dr. Ting will testify that he was the defendant's
15 orthopedic surgeon and will testify as to his physical observations of the defendant as well as his
16 observations of the defendant's interactions with Greg Anderson. Dr. Ting will also testify that
17 he drew blood from the defendant for testing, and that he gave the specimens to Greg Anderson
18 to deliver.

19 22. Valente, Jim: Mr. Valente, the former vice-president of Balco Laboratories, will
20 testify to his observations as an employee at Balco responsible for maintaining certain business
21 records, including log sheets reflecting the receipt of urine samples from athletes, the assignment
22 of codes to those samples, the referral of those samples to outside labs, and the receipt of test
23 results for those samples. Valente will testify that Greg Anderson provided him with blood and
24 urine samples for a number of athletes, including the defendant, and Valente would record the
25 names of those athletes on a log sheet and assign each sample a number in order to keep track of
26 the sample's testing referral date and results. Valente will specifically testify that the entries
27 "Barry B" on Balco internal documents reference the urine samples and results he entered for the
28 urine samples Greg Anderson submitted to Balco on behalf of the defendant.

1 23. Velarde, Randy: Mr. Velarde will testify that he was a professional baseball player
2 and that he met Greg Anderson during his tenure with the Oakland Athletics. Mr. Rios will
3 testify about receiving performance enhancing substances from Anderson, including anabolic
4 steroids.

5 24. Wilson, Mike: He will testify that he is a Special Agent with IRS-CID and that he
6 located a box of folders during the execution of a search warrant at a storage locker belonging to
7 Balco Laboratories.

8 25. Anderson, Greg: Mr. Anderson has been served with a subpoena that requires him
9 to testify at trial. As of this date, it is unknown whether Mr. Anderson will refuse to comply with
10 the subpoena.

11 26. Lab One Records Custodian: Melissa Duncan will testify regarding Lab One's
12 maintenance of business records reflecting its routine receipt and testing of blood samples.
13 Among the records to be admitted through this witness's testimony will be records reflecting the
14 receipt and test results for blood samples provided by the defendant.

15 27. Specialty Labs Records Custodian: A records custodian witness for this blood lab
16 will testify regarding Specialty Labs' maintenance of business records reflecting its routine
17 receipt and testing of blood samples. Among the records to be admitted through this witness's
18 testimony will be records reflecting the receipt and test results for blood samples provided by the
19 defendant.

20 28-39. Witnesses from UCLA Olympic Lab: The government may call some or all of the
21 following witnesses regarding the chain of custody maintained by the UCLA Lab in handling and
22 processing the steroids test for the defendant's urine sample – Brian Bishop, Borislav Starcevic,
23 Dr. Catlin, Yvonne Chambers, Todd McGauley, Stephen Kauffman, Brian Aherns, Javier

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1 Ceballos, Holly Daley, Ronald Gonzalez, Anabela Leung, Feresthteh Delshad, and Yu-Chen
2 Chang.

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4 DATED: February 13, 2009

Respectfully submitted,

5 JOSEPH P. RUSSONIELLO
6 United States Attorney

7 /s/
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